

### REMARKS

Applicants appreciate the consideration of the present application afforded by the Examiner. Claims 1-7 were pending prior to the Office Action. Claims 1, 4 and 7 have been canceled and claims 8 and 9 have been added through this Reply. Therefore, claims 2-3, 5-6, and 8-9 are pending. Claims 2, 3, and 5 are independent. Favorable reconsideration and allowance of the present application are respectfully requested in view of the following remarks.

#### *Claim Rejections - 35 U.S.C. §103(a)*

Claims 1-7 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent No. 6,697,825 to Underwood et al. ("Underwood") in view of U.S. Patent No. 6,023,714 to Hill et al. ("Hill"). Applicants submit the Examiner has failed to establish a *prima facie* case of obviousness and traverse the rejection.

For a 35 U.S.C. § 103 rejection to be proper, a *prima facie* case of obviousness must be established (see M.P.E.P. § 2142). One requirement to establish *prima facie* case of obviousness is that the prior art references, when combined, must teach or suggest all claim limitations (see M.P.E.P. §§ 706.02(j) and 2142). Thus, if the cited references fail to teach or suggest one or more elements, then the rejection is improper and must be withdrawn.

Through this Reply, Applicants have amended claims 2, 3, and 5 to be independent form. Claims 1, 4 and 7 have been canceled through this Reply, rendering the rejection of said claims moot. Applicants submit that Underwood and Hill, cannot teach or suggest, alone or in combination, at least all of the features of the claims as amended.

Independent **claim 2** recites a device for creating a sentence having decoration information comprising *inter alia* the features of "a decoration information table for storing combinations of decoration information; a decoration information detection unit for detecting the optimum combination of decoration information in said decoration information table in accordance with a request from the user" (emphasis added).

Underwood discloses a website generation method that provides design options for the client which are not dependent upon expert designers or programmers. For example, Underwood presents simplified design choice to the client in the form of the "Definer," a sort of assembly line allowing an end-user to generate a customized website while minimizing the cost of having

all development tasks performed by a third party (see, generally, Underwood, cols. 4-10). Basically, the Definer rearranges the elements of a user's web site in response to simplified input from the user until a desired design is obtained.

The Examiner concedes that Underwood does not disclose or suggest detecting an optimum combination of decoration information, and he supplies the Hill reference to allegedly cure this deficiency (see Office Action, page 3). Hill teaches a method for dynamically adapting the layout of a document by selecting a style sheet based on the capabilities of a particular display device (see Hill, col. 2, lines 14-23). Hill describes a "style sheet" as defining format properties of the elements of the document, such as text, font, and color properties (see id., col. 2, lines 40-44).

However, although Hill may disclose the above features the reference is silent regarding detecting an optimum combination of decoration information to be applied to a sentence in accordance with a request from a user, as claimed. For example, Hill recites that "[t]he display device is interrogated to determine the capabilities of the output device. Based upon the capabilities of the display device, one of the style sheets is selected" (see id., col. 2, lines 38-43). Furthermore, even in a client-controlled embodiment described by Hill,

the client requests a document from the server. The client receives the document and a layout generator from the server. The layout generator interrogates the output device to determine the capabilities of the output device. Based upon the capabilities of the output device, the layout generator selects a style sheet. The client requests the selected style sheet from the server and then renders the document on the output device using the selected style sheet.

Hill, column 3, lines 1-8 (emphasis added).

Thus, Hill recites that the layout generator determines the style sheet to be applied based on the detected characteristics of the output device, and therefore does not detect an optimum combination of decoration information to be applied in accordance with a request from a user.

Additionally, even if Underwood in view of Hill could somehow be interpreted to obviate the aforementioned limitations, which Applicants do not concede, claim 2 now recites "wherein said decoration information table comprises a theme-specific decoration information table for storing combinations of decoration information by theme, and wherein said decoration

*information detection unit detects a combination of decoration information in said theme-specific decoration information table based on a theme entered by the user.*"

The Examiner alleges that col. 25, lines 51-67 and Figure 10 of Underwood cover the aforementioned features of claim 2 (see Office Action, page 4). This passage in Underwood discloses functionality by which a user may apply specific text characteristics, such as "Font Type" and "Text Color," to a website using pull-down lists. Figure 10 describes the Site Definer page whereby a particular industry type may be selected. However, none of these citations nor Underwood as a whole disclose or suggest either a theme-specific decoration table for storing combinations of decoration information by theme or a decoration information detection unit which detects an optimum combination of decoration information based on a theme entered by the user.

In any case, Hill fails to teach or suggest detecting an optimum combination based on a theme entered by a user, at least because Hill teaches that the layout generator automatically determines a style sheet to be applied based on the detected characteristics of the output device, not specific user input. Additionally, Hill fails to cure the deficiencies of Underwood with respect to a theme-specific decoration table. Accordingly, Underwood and Hill fail to obviate all the features of independent claim 2, alone or in combination.

Independent **claim 3** recites, *inter alia*, the features of "a decoration information table for storing combinations of decoration information; a decoration information detection unit for detecting the optimum combination of decoration information in said decoration information table in accordance with a request from the user." The previous discussion of these limitations with respect to claim 2 is applicable to claim 3.

Claim 3 further recites "wherein said decoration information table comprises a keyword-specific decoration information table for storing combinations of decoration information by keyword, and wherein said decoration information detection unit detects a combination of decoration information in said keyword-specific decoration information table based on a keyword of a sentence entered by the user."

As with the limitations of claim 2 as previously discussed, the Examiner alleges that col. 25, lines 51-67 and Figure 10 of Underwood cover the aforementioned features of claim 3. The

Examiner's only explanation separate from that applied to claim 2 is that "phrases [are] applied to an image" (see Office Action, page 4). This passage in Underwood discloses functionality by which a user may apply specific text characteristics, such as "Font Type" and "Text Color," to a website using pull-down lists. Figure 10 describes the Site Definer page whereby a particular industry type may be selected. However, Underwood fails to disclose or suggest a keyword-specific decoration information table as alleged by the Examiner.

As previously discussed, neither Underwood nor Hill detects an optimum combination of decoration information to be applied in accordance with a request from a user, much less "*based on a keyword of a sentence entered by the user*" as recited in claim 3. Accordingly, Underwood and Hill fail to obviate all the features of independent claim 3, alone or in combination.

Independent **claim 5** recites, *inter alia*, the features of "*a decoration information table for storing combinations of decoration information; a decoration information detection unit for detecting the optimum combination of decoration information in said decoration information table in accordance with a request from the user.*" The previous discussion of these limitations with respect to claim 2 is applicable to claim 5.

Claim 5 further recites "*wherein said decoration information table comprises a transmission-destination-specific decoration information table for storing combinations of decoration information by transmission destination, and wherein said decoration information detection unit detects a combination of decoration information in said transmission-destination-specific decoration information table based on a transmission destination entered by the user.*"

As with the limitations of claims 2 and 3 as previously discussed, the Examiner alleges that col. 25, lines 51-67 and Figure 10 of Underwood cover the aforementioned features of claim 3. This passage in Underwood discloses functionality by which a user may apply specific text characteristics, such as "Font Type" and "Text Color," to a website using pull-down lists. Figure 10 describes the Site Definer page whereby a particular industry type may be selected. Although the Examiner additionally cites Figure 77 of Underwood, pointing to the "remote application" (see Office Action, page 6), this figure, and indeed Underwood as a whole, fails to disclose a transmission-destination-specific decoration information table as alleged by the Examiner.

Neither Underwood nor Hill detects an optimum combination of decoration information to be applied in accordance with a request from a user, much less “*based on a transmission destination entered by the user*” as recited in claim 5. Accordingly, Underwood and Hill fail to obviate all the features of independent claim 5, alone or in combination.

Based on the foregoing, the combination of Underwood and Hill fails to teach or suggest each and every limitation of independent claims 2, 3, and 5. Dependent claim 6 is also distinguishable from the prior art at least due to its dependence from claim 2.

Therefore, Applicants submit that claims 2, 3, 5, and 6 are patentable over the applied prior art and respectfully request that the rejection of said claims under §103(a) be withdrawn.

#### ***New Claims***

New claims 8 and 9 have been added through this Amendment, and are considered to be in condition for allowance at least due to their dependence upon allowable claims 3 and 5. No new matter has been entered.

**CONCLUSION**

All objections and rejections raised in the Office Action having been addressed, it is respectfully submitted that the present application is in condition for allowance. Notice of same is earnestly solicited.

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact John R. Sanders, Reg. No. 60,166 at the telephone number of the undersigned below, to conduct an interview in an effort to expedite prosecution in connection with the present application.

If necessary, the Director is hereby authorized in this, concurrent, and future replies to charge any fees required during the pendency of the above-identified application or credit any overpayment to Deposit Account No. 02-2448.

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Respectfully submitted,

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